



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 5, 2023

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,  
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act. We write to respectfully request a 45-day extension of the time for the Government to move for summary judgment, from December 7 to January 21, 2024, and extensions of Plaintiffs’ time to file oppositions papers from January 8 to February 20, 2024, and the Government’s time to file its reply papers from January 22 to March 5, 2024.

The reason for this request is that more time is needed to prepare the agency declaration in light of the highly technical nature of the issues presented by a database that will need to be addressed, in addition to upcoming holiday and vacation schedules of the undersigned and at the agency. This is the Government’s second request for an extension of the summary judgment briefing schedule. Plaintiffs consent to the Government’s request.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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Southern District of New York  
*Attorney for Defendant*

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cc: Plaintiffs’ counsel (by ECF)